

NATALIE K. WIGHT, OSB #035576
United States Attorney
District of Oregon
JEFFREY S. SWEET, OSB #994183
Jeff.Sweet@usdoj.gov
NATHAN J. LICHVARCIK
Nathan.j.Lichvarcik@usdoj.gov
MARCO A. BOCCATO, OSB #103437
Marco.Boccato@usdoj.gov
Assistant United States Attorneys
405 East 8th Avenue, Suite 2400
Eugene, Oregon 97401
Telephone: (541) 465-6771
Attorneys for the United States of America

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON

UNITED STATES OF AMERICA

1:23-cr-00254-MC

v.

GOVERNMENT'S WITNESS LIST

NEGASI ISHAIHA ZUBERI, aka
JUSTIN JOSHUA HYCHE,

Defendant.

The United States hereby gives notice that it intends to call some or all of the following witnesses during its case-in-chief at trial or potentially in rebuttal. The government respectfully reserves the right to amend this list and to call additional witnesses if necessary during its case-in-chief or in rebuttal. The government also reserves the right to call any witnesses listed on the defendant's witness list or witnesses who the defense calls. The estimated time listed for each witness is for direct examination only.

Lara Adams, FBI

FBI Forensic Examiner Adams will testify regarding the DNA evidence analyzed during the investigation, and the results obtained. (1.5 hours)

Colton Albert, RPD

Reno Police Department Officer Albert performed a traffic stop in Reno on July 16, 2023 on the Honda Pilot driven by Negasi Zuberi. He was present during the attempt to arrest Mr. Zuberi and his ultimate arrest. Officer Albert photographed a knife in the vehicle. (20 minutes)

Amazon custodian of records

An Amazon employee will testify regarding Mr. Zuberi's Amazon accounts and the purchases made using the accounts. (30 minutes)

Erik Anderson, FBI

SA Anderson was present during the arrest of Negasi Zuberi, spoke with Alycia Westfall, and was with Mr. Zuberi in the ambulance and at the hospital. (45 minutes)

Tyler Archibald

Mr. Archibald knew Mr. Zuberi and communicated with him online regarding firearms, women and the construction of a concrete structure. They also went to a gun store together. (30 minutes)

AV1

Mr. Zuberi kidnapped AV1 in Seattle, Washington and took her to his house at 1336 N Eldorado Ave., Klamath Falls, Oregon. During the trip he sexually assaulted AV1. He imprisoned her in a cell in his garage until she escaped. (3 hours)

AV2

Mr. Zuberi kidnapped AV2 in Klamath Falls, Oregon, and took her to his house at 1336 N Eldorado. He kept AV2 imprisoned in his garage and sexually assaulted her. (2.5 hours)

Kori Barnum, OSP

Forensic scientist Barnum collected samples of potential biologic or trace evidence during the July 16, 2023 search of the residence at 1336 N Eldorado. (30 minutes)

Tim Broadway, RPD

Officer Broadway, a crisis negotiator with RPD, talked with Mr. Zuberi in Reno on July 16, 2023, ultimately convincing Mr. Zuberi to surrender. Officer Broadway's body camera captured parts of the conversation with Mr. Zuberi. (30 minutes)

Jeff Byram, FBI

The United States intends to offer an affidavit from FBI Supervisory Special Agent (SSA) Byram regarding actions taken to verify and authenticate iCloud data received from Apple pursuant to a search warrant. In the alternative, SSA Byram will testify in person. (20 minutes)

Chase Bank

A Chase Bank employee will testify regarding Mr. Zuberi making an ATM withdrawal on May 6, 2023, in Klamath Falls. They will also testify regarding the general operation of ATMs, and why no video of Mr. Zuberi using the ATM on May 6th was provided.

Zailah Chavez

Ms. Chavez rented a room from Mr. Zuberi at the 1336 N Eldorado residence in May 2023. Ms. Chavez was at The Pikey with Mr. Zuberi on May 5, 2023. (20 minutes)

Bryan Chiles

Senior Manager Bryan Chiles works for Axon, the manufacturer of the Taser Pulse, the model of taser found in Mr. Zuberi's trailer. Mr. Chiles will testify regarding how the Taser Pulse operates, its effects on a person, and that the taser and its

cartridges are assigned unique identifying numbers. He will also testify about the identifying numbers of the taser cartridges and taser found in Mr. Zuberi's trailer. (60 minutes)

Rachel Clay, FBI FBI Forensic Examiner Clay will testify regarding the handwriting on documents seized from Mr. Zuberi's residence, and her comparison of the handwriting to other known writing samples. (1 hour)

Cedric Coleman Mr. Coleman worked as a bouncer at The Pikey on May 5, 2023, and will testify as to what he observed and to his subsequent review of surveillance video. (15 minutes)

Brianna Crawford Ms. Crawford worked as a bartender at The Pikey on May 5, 2023. She identified Mr. Zuberi from his credit card after learning of the investigation. (15 minutes)

Armando Davila, KFPD Reserve Officer Davila secured the residence at 1336 N Eldorado prior to the July 16, 2023 search, and he assisted with the search. (20 minutes)

Alex Davenport, KFPD Officer Davenport participated in the July 16, 2023 search warrant at 1336 N. Eldorado. (20 minutes)

Diego Delgado Mr. Delgado was with AV2 in The Pikey on May 5, 2023, and will testify as to what he observed. (15 minutes)

Brandon Dougherty, OSP Det. Dougherty participated in the July 16, 2023 search at 1336 N Eldorado. He has body camera video from the search. He later went to Tule Lake, California, and found surveillance video of Mr. Zuberi, which he recorded. (60 minutes)

Brett Dutton, KFPD

Officer Dutton participated in the July 16, 2023 search at 1336 N Eldorado. (15 minutes)

Shasta Duval, KCSO

Klamath County Sheriff's Office Sgt. Duval responded to Ms. Geary's 911 call and met with Ms. Geary and AV1. She seized the pistol that AV1 took from Mr. Zuberi's car, and talked with AV1 and Ms. Geary. She transported AV1 for medical treatment and photographed AV1's injuries while at the hospital. (45 minutes)

Ashley Ensminger, KCSO

Deputy Ensminger drove Ms. Geary to the area where Ms. Geary picked up AV1. (15 minutes)

Trahern Fox, KFPD

Sgt. Fox participated in the July 16, 2023 search at 1336 N Eldorado. (15 minutes)

Jose Gamez, KFPD

Officer Gamez participated in the July 16, 2023 search at 1336 N Eldorado and seized evidence. (20 minutes)

Carlos Garcia

Mr. Garcia lived next to Mr. Zuberi, and on July 15, 2023 he heard a female scream for help, and saw a vehicle stop in the area. Mr. Garcia is familiar with Mr. Zuberi, Alycia Westfall and their vehicles. (30 minutes)

Melissa Geary

Ms. Geary was driving in Klamath Falls on July 15, 2023 when she saw a woman in distress (AV1) on Eldorado Ave. She picked up AV1 and drove to a nearby location, and then called 911. Ms. Geary was later driven by a KCSO deputy to the area where she picked up AV1. (30 minutes)

Austin Gilmore, KFPD

Ofc. Gilmore interviewed AV1 at Sky Lakes Medical Center. Ofc. Gilmore and Ofc. Trippett drove her to find the location where she was held, and they went to 1336 N Eldorado. He later spoke to Alycia Westfall, interviewed Melanie McClure, and secured the residence. (45 minutes)

Christopher Giovanetty, FBI

SA Giovanetty will testify on several occasions regarding audio recordings of Mr. Zuberi that he reviewed, individuals he interviewed, data located on Mr. Zuberi's digital devices and iCloud accounts, relevant jail calls, and evidence collected during the course of the investigation. (2.5 hours)

Travis Gluesenkamp, FBI

SA Gluesenkamp will testify on several occasions regarding the overall investigation, including locations searched, items seized, digital evidence, location data, individuals interviewed, and evidence collected during the course of the investigation. (3 hours)

Nicholas Griebel, RPD

Det. Griebel with the Reno Police Department is also a Task Force Officer with the FBI. Det. Griebel rode in the ambulance with Mr. Zuberi on July 16, 2023, and his body camera captured conversations with Mr. Zuberi in the ambulance and at the hospital. (45 minutes)

John Hobby, OSP

Forensic scientist Hobby collected samples of potential biologic or trace evidence during the July 16, 2023 search of 1336 N Eldorado. (30 minutes)

"June"

The name "June" was on the Targets list in Mr. Zuberi's residence and a screenshot of her Tryst profile and image was in his iCloud account. She will identify the Tryst profile as being hers. (15 minutes)

Emily Keeton

Ms. Keeton is the manager of The Pikey, and will testify regarding her review of surveillance video from May 5, 2023. (20 minutes)

Sean Kennedy FBI

SA Kennedy is an expert in cellular location data. He will testify regarding location data obtained during the investigation and where the data shows the devices collecting/transmitting it were located. (1.5 hours)

Greg Lara

Mr. Lara worked as the lead bouncer at The Pikey on May 5, 2023. He saw AV2 that night, and reviewed surveillance footage. (20 minutes)

Justin Lazenby, FBI

FBI Master Digital Forensic Examiner Lazenby will testify regarding digital devices, his role in the extraction of data from seized digital devices, and the location of specific data. (1 hour)

Daniel Logan, FBI

SA Logan was the Evidence Response Team leader for the FBI's search of Mr. Zuberi's Honda Pilot in Reno, Nevada, and will testify regarding the search. (30 minutes)

Joel Loudermilk, KFPD

Det. Loudermilk is the lead detective for KFPD for the kidnapping of AV1. He was the affiant in the state search warrant for the July 16, 2023 search of 1336 N Eldorado, and participated in the search. He was also present at the search of the Prowler trailer and the Bonanza property. (45 minutes)

April Markowski, FBI

SA Markowski spoke with Mr. Zuberi when he was in the ambulance, and spoke with Alycia Westfall. (20 minutes).

Kathy Maxwell

Ms. Maxwell worked at AAA Discount Storage in Klamath Falls. She will testify that Mr. Zuberi rented trailer space RV106, and will discuss details of his rental. (15 minutes)

Jennifer McAfee

Ms. McAfee is friends with AV2, and was with her at The Pikey on May 5, 2023. She will testify to what she observed. (20 minutes)

Melanie McClure

Ms. McClure was Mr. Zuberi's neighbor, and was familiar with his vehicles and Alycia Westfall. Ms. McClure was at The Pikey on May 5, 2023 when Mr. Zuberi arrived. Earlier that evening, Ms. McClure interacted with Mr. Zuberi and Ms. Westfall. (30 minutes)

Erik Mendoza

Mr. Mendoza rented a room from Mr. Zuberi at the 1336 N Eldorado residence in May 2023. Mr. Mendoza was at The Pikey with Mr. Zuberi on May 5, 2023. (20 minutes)

MV1

MV1 will testify regarding being sexually and physically assaulted by Mr. Zuberi in Oakland, California, in 2020. (1 hour)

Johnnie Najar III

Mr. Najar was with AV2 in The Pikey on May 5, 2023, and will testify as to what he observed. (15 minutes)

Christopher Parkerson

Mr. Parkerson rented a room at 1336 N Eldorado from Mr. Zuberi, and in July 2023 he lived at the residence on the downstairs floor. (15 minutes)

Shelby Quick, FBI

Electronics Engineer Quick is employed by the FBI Office of Technology Division, and will testify regarding the function and operability of the signal jammers and another electronic device which were located in the Prowler trailer. (45 minutes)

“Quinn”

“Quinn”, whose name and date of birth was on the Targets list in Mr. Zuberi’s residence, will testify regarding her identity and place of employment, and that she did not know Mr. Zuberi. (10 minutes)

Paul Rettig, FBI

FBI Digital Evidence Support Team Leader Rettig will testify regarding the processing of Mr. Zuberi’s iCloud data which the FBI obtained pursuant to a search warrant. (30 minutes)

Christina Ruelas

Ms. Ruelas is the mother of AV2’s friend. After going to the hospital, AV2 went to Ms. Ruelas’ residence on May 6, 2023. Ms. Ruelas saw AV2’s injuries, and took her to the hospital on May 7, 2023. (20 minutes)

Geovanni Ruelas

Mr. Ruelas is AV2’s friend, and will testify that he saw her on May 6, 2023, that her face was swollen, and that he took her to the hospital on May 6th. (20 minutes)

Nayeli Ruelas

Ms. Ruelas is the brother of Geovanni Ruelas. She saw AV2’s injuries and went to the hospital with AV2 on May 7, 2023. (15 minutes)

Christopher Sinclair, FBI

SA Sinclair will testify regarding evidence collected or obtained during the investigation, including financial records and records of purchases. SA Sinclair was present during the search of the Honda Pilot. (1 hour)

Prentice Smith

Mr. Smith will testify regarding renting a room from Negasi Zuberi in Vancouver, Washington, in 2022, and that Mr. Smith possessed firearms while living there. He was locked out of the residence and lost possession of his firearms, and spoke to Mr. Zuberi about getting them back. One of his firearms, a pistol, was later seized from AV1; the FBI found the other three firearms in Mr. Zuberi's Prowler trailer in Klamath Falls. (45 minutes)

Jessie Snyder, KFPD

Det. Snyder secured the residence at 1336 N Eldorado, and later went to Merrill, Oregon and located the Nissan Altima. He obtained surveillance video of a Honda Pilot and the Altima arriving, and of Mr. Zuberi at the market. He checked the garbage and was present when the Altima was towed. (20 minutes)

Dylan Staples, RPD

Officer Staples was present when Mr. Zuberi was arrested in Reno, Nevada. He spoke with Mr. Zuberi and Alycia Westfall. (45 minutes)

Jeremy Stein, Jr., LandAirSea

Mr. Stein works for LandAirSea, a company that sells location monitoring devices and a subscription service. He will testify regarding the data LandAirSea provided the FBI pursuant to a search warrant, how the tracking devices and software operate, and to how location data is collected and stored. (30 minutes)

Stephanie Stewart, FBI

FBI Forensic Examiner Stewart will testify regarding fingerprints located on notebooks and journals at 1336 N Eldorado, as well as on a bag located in the Prowler trailer. (45 minutes)

Bradley Stricklen

Mr. Stricklen rented a room at 1336 N Eldorado from Mr. Zuberi, and in July 2023 he lived at the residence on the downstairs floor. (15 minutes)

Sam Suyehira, ATF

SA Sam Suyehira will testify regarding his examination of firearms which were seized during the investigation and his determination that they are firearms and that prior to being seized they traveled in interstate commerce. (30 minutes)

Connor Thun, KFPD

Officer Thun participated in the July 16, 2023 search of Mr. Zuberi's residence at 1336 N Eldorado. (15 minutes)

Anthony Trippet, KFPD

Officer Trippet was present with Ofc. Gilmore during the interview of AV1 at Sky Lakes Medical Center. He went with AV1 to the 1336 N Eldorado residence, and conducted scene security pending a search warrant on the residence. (20 minutes)

Heidi Wallace, ATF

ATF SA Wallace will testify regarding her examination of ammunition which was seized during the investigation, and her determination that it is ammunition and that prior to being seized it traveled in interstate commerce. (30 minutes)

Amie Walton

Providence Medical Center Nurse Walton spoke to AV1 on July 15, 2023 regarding AV1 being kidnapped and sexually assaulted by Mr. Zuberi. She also collected and sealed evidence in the SANE kit. (30 minutes)

Brenden Westfall

Mr. Westfall saw Mr. Zuberi driving a Honda Pilot from Home Depot with a pallet full of concrete blocks. He also went to 1336 N Eldorado on May 6, 2023. Mr. Westfall later helped to deconstruct the cell at 1336 N Eldorado. (20 minutes)

Carol Westfall

Mrs. Westfall owns 1336 N Eldorado and rented the residence to Mr. Zuberi. (15 minutes)

Kevin Westfall

Mr. Westfall owns 1336 N Eldorado and rented the residence to Mr. Zuberi. Mr. Westfall deconstructed the cell. (30 minutes)

Jay Williams, MD

Dr. Jay Williams worked at the Sky Lakes Medical Center in Klamath Falls on May 7, 2023. He was the treating physician for AV2, and will testify regarding his medical assessment of her. (30 minutes)

Kylie Winkle-O'Brien

Ms. Winkle-O'Brien worked at the Merrill, Oregon, FastBreak on July 16, 2023. She will testify regarding her conversation with Mr. Zuberi about parking the Nissan Altima. (10 minutes)

Christi Winters, FBI

FBI Digital Forensic Examiner Winters will testify regarding her role in the extraction of data from seized digital devices and iCloud accounts, and the location of specific data. She will also testify generally regarding digital devices and iCloud accounts. (45 minutes)

Tyler Young, KFPD

School Resource Officer Young interviewed AV1. He also participated in the July 16, 2023 search of 1336 N Eldorado and seized evidence. (20 minutes)

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Chris Zupan, KFPD

Det. Sgt. Zupan coordinated the initial investigation. He also participated in the interview of AV1 and the July 16, 2023 search of 1336 N Eldorado. (1.5 hours)

Dated: August 7, 2024

Respectfully submitted,

NATALIE K. WIGHT
United States Attorney

s/ Jeffrey S. Sweet
JEFFREY S. SWEET
NATHAN J. LICHVARCIK
MARCO A. BOCCATO
Assistant United States Attorneys